



Donald J. Camerson, II  
Principal

325 Columbia Turnpike  
Suite 301  
Florham Park, NJ 07932  
Tel: 973.514.1200  
Fax: 973.514.1660

Direct: 973.660.4433  
djcamerson@bressler.com

January 26, 2022

**Via ECF**

The Honorable Ann Marie Donio, U.S.M.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, New Jersey 08101

**Re: *Bond, et al. v. Solvay Specialty Polymers USA, LLC, et al.*, No. 1:20-cv-08487  
*Slusser, et al. v. Solvay Specialty Polymers USA, LLC, et al.*, No. 1:20-cv-11393  
*Deese, et al. v. Solvay Specialty Polymers USA, LLC, et al.*, No. 1:21-cv-00217  
*Corrar, et al. v. Solvay Specialty Polymers USA, LLC, et al.*, No. 1:21-cv-00452  
*Bond v. Solvay Specialty Polymers USA, LLC, et al.*, No. 1:21-cv-11203  
*Bond v. Solvay Specialty Polymers USA, LLC, et al.*, No. 1:21-cv-20755**

Dear Judge Donio:

During the status conference held on January 18, 2022, and as memorialized in the Court's Order dated January 20, 2022, Your Honor directed the parties to attempt to agree upon a proposed ESI Protocol and, if the parties were unable to do so, the parties were to advise the Court of the status by today, January 26, 2022. On Saturday, January 22, 2022, the Defendants received proposed edits from the Plaintiffs. The parties conferred at 3:00 p.m. this afternoon to discuss pending issues, including the ESI Protocol, and our conference was productive. The parties have narrowed the issues pertaining to the ESI Protocol such that they anticipate being able to reach a resolution within the next week. In view of this, the parties jointly request that Your Honor grant them a one-week extension of time through and including Wednesday, February 2, 2022, in order for the parties to finalize the ESI Protocol.

Respectfully submitted,

/s/Donald J. Camerson, II  
Donald J. Camerson, II

cc: All counsel of record (via ECF)